

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

_____	)	
NICHOLAS J. LOUISA, ESQ.	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	Civil Action No. 1:20-cv-11691-FDS
NETFLIX, INC., NETFLIX WORLDWIDE	)	
ENTERTAINMENT, LLC, JIGSAW	)	
PRODUCTIONS LLC, MUDDY WATERS	)	
PRODUCTIONS LLC, ALEX GIBNEY,	)	
RICHARD PERELLO, STACEY OFFMAN,	)	
PETER KNOWLES, SAMANTHA KNOWLES,	)	
LISA SIEGELBELANGER, LONNIE	)	
BRENNAN and the BOSTON BROADSIDE,	)	
	)	
Defendants.	)	
_____	)	

**PLAINTIFF’S MOTION TO REMAND**

Pursuant to 28 U.S.C. § 1447(c), Plaintiff Nicholas J. Louisa, Esq. (“Plaintiff” or “Attorney Louisa”) respectfully moves this Court to remand this action back to the Middlesex County Superior Court of the Commonwealth of Massachusetts (the “Superior Court”). As set forth more fully in his accompanying memorandum, this is a defamation action and there is no federal question raised in Attorney Louisa’s *Amended Complaint and Jury Demand*. Indeed, the argument advanced by The Boston Broadside (“Boston Broadside”) in its *Notice of Removal* that it intends to assert a defense under the First Amendment, even if available, is an utterly meritless basis upon which to try and ground federal jurisdiction given settled law throughout the United States. Unfortunately, Boston Broadside’s removal effort is transparently geared more to delaying a scheduled hearing in the Superior Court, which was to take place this Friday, September 18, 2020. Attorney Louisa anticipates that at that hearing the Superior Court will dissolve the short order of

impoundment of the case file, which he obtained after which this lawsuit, and defendants' tortious misconduct, would be a matter of public record. (Plaintiff notes that it was announced today, after the improper removal of the case yesterday, that the courts of the Commonwealth will be closed Friday to honor Chief Justice Gants). Additionally, the *Notice of Removal* is both untimely and procedurally improper.

WHEREFORE, Attorney Louisa respectfully requests that this Court allow this motion and remand this case back to the Superior Court. Plaintiff further requests that this Court award him his fees and costs.

Respectfully submitted,  
PLAINTIFF NICHOLAS J. LOUISA, ESQ.,  
By his attorneys,

/s/ Matthew S. Furman  
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Matthew S. Furman (BBO No. 679751)  
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Dated: September 16, 2020

#### **RULE 7.1 CERTIFICATION**

I, Howard M. Cooper, hereby certify that, pursuant to Local Rule 7.1(a)(2), I have conferred with counsel for the Boston Broadside and attempted in good faith to resolve or narrow the issues that are the subject of this motion, but have been unsuccessful in doing so.

/s/ Howard M. Cooper  
Howard M. Cooper

**CERTIFICATE OF SERVICE**

I, Matthew S. Furman, hereby certify that this document has been filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on September 16, 2020.

/s/ Matthew S. Furman

Matthew S. Furman